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 5 Fax: +1 415 373 3959
 6 E-Mail: aaron.greenspan@plainsite.org

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AARON GREENSPAN,
 Plaintiff,
 v.
 OMAR QAZI, SMICK ENTERPRISES, INC.,
 ELON MUSK, and TESLA, INC.,
 Defendants.

Case No. 3:20-cv-03426-JD

**DECLARATION OF AARON
 GREENSPAN IN SUPPORT OF
 PLAINTIFF'S REPLY IN
 SUPPORT OF EMERGENCY
 MOTION FOR ORDER TO
 PRESERVE EVIDENCE**

I, Aaron Greenspan, declare as follows:

1. On September 1, 2021 at 1:20 P.M., after the filing of my Emergency Motion For Order To Preserve Evidence, Omar Qazi sold his Tesla Model 3 to Warren Redlich, an attorney with a history of disciplinary disputes in the State of New York who is also a social media influencer focused on Tesla and Elon Musk, now based in Florida.

2. Through his @WholeMarsBlog account, Omar Qazi has repeatedly represented to the public that he was selling his car in order to file a new legal action against me and members of my family, not to finance his legal defense in this action or to pay for his basic living expenses, as he now claims. To the best of my knowledge, he wrote, "Selling to sue AG." and "It's going to be so satisfying to sue Aaron, his company, his charity, and it's *[sic]* board. 😊"

3. To the best of my knowledge, Omar Qazi indicated a lack of any acute financial stress by also writing, "By the way, the car sale isn't actually needed to counter sue Aaron."

1 4. As Exhibit A, I have attached a true and correct copy of the carsandbids.com
2 auction page reflecting the sale of Omar Qazi's Tesla Model 3.

3 5. As Exhibit B, I have attached a true and correct copy of Omar Qazi's LinkedIn
4 resume, showing his employment at BQE Software, Inc.

5 6. As Exhibit C, I have attached true and correct copies of the first page of each
6 ProPublica Paycheck Protection Program federal loan database entry for BQE Software, Inc.

7 7. As Exhibit D, I have attached a true and correct copy of the @WholeMarsBlog
8 Twitter account discussing the purchase of a Tesla Model X "for Dad" on August 11, 2021.

9 8. As Exhibit E, I have attached true and correct copies of select posts by the
10 @WholeMarsBlog Twitter account discussing the supposed reason for the auction and sale of
11 Omar Qazi's Tesla Model 3 from August 25, 2021 through August 31, 2021.

12 9. As Exhibit F, I have attached a true and correct copy of a March 31, 2019 article
13 from The Drive entitled, "Unencrypted Video and Personal Data Stored on Teslas Raise
14 Significant Privacy Concerns: Report" by Rob Stumpf.

15 10. In my declaration submitted to this Court on August 31, 2021 and docketed as
16 ECF No. 134-1 in this action, I inadvertently overlooked a date on page 2, line 7. The date
17 should have read August 31, 2021, not July 2, 2021.

18 I declare under penalty of perjury under the laws of the United States that the above
19 statements are true and correct and that this declaration was executed on September 2, 2021 in
20 San Francisco, California.

22 Dated: September 2, 2021

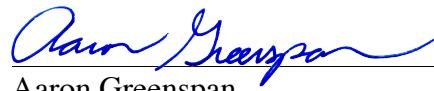
24 
25 Aaron Greenspan

EXHIBIT A

carsandbids.com Auction Page Reflecting Sale of Omar Qazi's Tesla Model 3

2018 Tesla Model 3 Long Range ☆

1 Owner, Unmodified, California-Kept, Autopilot Technology

Share 



Sold for \$44,069

9/1/21 Bids 22

Q This auction has ended, see more Tesla Model 3 auctions [here](#).

Ended September 1 at 1:23pm PDT

Make	<u>Tesla</u>	Engine	Single Motor
Model	<u>Model 3 ☆</u>	Drivetrain	Rear-wheel drive
Seller	 <u>omarqazi</u>	Transmission	Automatic
Location	Torrance, CA 90505	Exterior Color	Black
VIN	5YJ3E1EA5JF013920	Interior Color	Black
Mileage	76,900	Title Status	Clean (CA)
Body Style	Sedan	Seller Type	Private Party



Doug's Take

We love Teslas here on Cars & Bids, and this is a particularly desirable one -- a 2018 Model 3 Long Range that boasts a ton of great Tesla features. As the trim level suggests, this one touts long-range battery capacity in addition to Tesla's Autopilot technology and a panoramic roof. This is a one-owner car that's spent its life in dry-climate California, and this one comes with a clean, accident-free Carfax report -- and evidently, Elon Musk signed the sun visor, which is a cool detail. The Model 3 is one of my favorite cars currently on sale, and I have a feeling the next owner will be thrilled with this one.

Highlights

THIS... is a 2018 Tesla Model 3 Long Range, finished in black with a black interior.

- The attached Carfax history report lists no accidents in this Model 3's past. It also shows that this is a one-owner car that's been exclusively registered in California.
- Factory equipment includes 18-inch wheels, a panoramic roof, wood interior trim, leather upholstery, a 15-inch touchscreen, a premium sound system, the Premium Connectivity Package, and Full Self-Driving Capability. The seller reports no

modifications.

- Launched for 2018, the Tesla Model 3 was celebrated as a premium EV with a usable range and respectable performance, all at a reasonably attainable price. It's still available in 2021.
- Power for this Model 3 comes from an electric motor, which produces 271 horsepower and 307 lb-ft of torque. Connected to a 75-kWh lithium-ion battery pack, it zaps the rear wheels into motion. The Long Range version has an EPA-estimated driving range of up to 310 miles.

Equipment

- 18-inch wheels
- Panoramic roof
- Wood interior trim
- Leather upholstery
- Power-adjustable front seats
- Premium sound system
- 15-inch touchscreen
- Lifetime Free Premium Connectivity Package
- Premium Connectivity Package
- Autopilot technology
- Full Self-Driving Capability

Known Flaws

- Chips on the front end
- Some exterior scuffs and scratches
- Scratches on the wheels
- Some creases on the driver's seat's outer bolsters

Recent Service History

- Invoices pictured in the gallery show that this Model 3 received new tires in December 2020, and that it was ceramic coated in February 2019.
- The seller notes additional service history is available in the Tesla app.

Other Items Included in Sale

- 1 key
- Owner's manuals
- Charging cables

Ownership History

The seller purchased this Model 3 new in April 2018.

Seller Notes

The seller states Tesla co-founder and CEO Elon Musk signed this Model 3's passenger-side sun visor. He adds that Musk is shown signing the car in a video, and a photo of the signature is included in the gallery.

Video



Seller Q&A (1)

[View all](#)

 [SKGrowth](#)  ↑ 4

Q: Is there a way for you to confirm that the FSD is transferable to the next owner? I have read of cases where new owners are asked to pay for FSD on a M3 that the prior owner already paid for it ?

↑ 2 [View answer](#)

2018 Tesla Model 3 Long Range · Reserve

Sold to  [wredlich](#)

\$44,069

Seller  [omarqazi](#)

Ended  Sep 1, 2021 1:23pm PDT
Bids # 22
Views  12,813

Comments & Bids

[Newest](#) [Most Upvoted](#) [Seller Comments](#) [Bid History](#)

Add a Comment...



 [Nitro](#) ↑ 423 1 hour ago

Re: BenBarreto Order one now and you'll get it delivered in January 2022(According to Tesla) and who knows, it could be delayed even more than that! Some people are not willing to wait 4+ months for a car they could readily buy and drive within a week.

↑ 0 [Reply](#) [Flag as inappropriate](#)

 [BenBarreto](#)  ↑ 11 16 hours ago

Hmm. place an order for one now and have it in a few months. or pay msrp for a 3 year old model 3 with 76k miles.

[↑ 0](#) Reply [Flag as inappropriate](#)

voltequity  [↑ 3](#) **Bidder** 21 hours ago

Congrats Warren for the win! Glad another Tesla bull will take care of this very special car

[↑ 0](#) Reply [Flag as inappropriate](#)

vinny808  [↑ 18](#) **Bidder** 22 hours ago

congrats [@wredlich](#) cant wait to see your youtube video about it

[↑ 0](#) Reply [Flag as inappropriate](#)

EV 4 SURE  [↑ 10](#) **Bidder** 22 hours ago

Congrats Warren! 

[↑ 1](#) Reply [Flag as inappropriate](#)

rwilla1023 [↑ 511](#) 22 hours ago

Way to go [@wredlich](#)

[↑ 0](#) Reply [Flag as inappropriate](#)

Cars&Bids [↑ 24.8k](#) 22 hours ago

A Model 3 in triple black screams stealth and we're sure [@wredlich](#) can't wait to fly under the radar in their new Tesla! We're very excited to get this Long Range EV off to a happy new home for [@omarqazi](#)!

[↑ 1](#) Reply

Sold to [wredlich](#) for \$44,069

22 hours ago

wredlich  [↑ 22](#) 22 hours ago

Bid \$44,069

[↑ 4](#)

vinny808  [↑ 18](#) 22 hours ago

Bid \$43,440

[↑ 2](#)

wredlich  [↑ 22](#) 22 hours ago

Bid \$43,190

[↑ 2](#)

vinny808  [↑ 18](#) 22 hours ago

Bid \$42,940

[↑ 2](#)

wredlich  [↑ 22](#) 22 hours ago

Bid \$42,690

[↑ 3](#)

vinny808  [↑ 18](#) 22 hours ago

Bid \$42,369

[↑ 3](#)

griffd [↑ 2](#) 22 hours ago

Great car!!! Miss my early 2018 single motor Model 3. It had great build quality compared to the late 2018 models (quality slipped a bit during production hell ramp-up).

[↑ 2](#) Reply [Flag as inappropriate](#)

EV 4 SURE  [↑ 10](#) **Bidder** 22 hours ago

I'm Out Guys Thanks for the Excitement and Good Luck Omar! Truly for a Good Cause!  \$42,069 

[↑ 5](#) Reply [Flag as inappropriate](#)



[sweeneywinegeek](#) 714 22 hours ago

@SKGrowth you'll never get a solid answer from Tesla. Great cars, horrible communication. Can't ever get anyone on the phone. No one to email. All communication goes through the service section on the App. Cloak and Dagger kind of stuff. In fact once I stopped into the service department because the Dual Motor sticker was falling off our car and the guy there said 'just enter the info into the App'. We had to get one of the camera's replaced. The tech came to our house to do the work and only then was I able to get answers to my many questions. Great car though

[↑ 1](#) Reply [Flag as inappropriate](#)



[jermhoop](#) 22 hours ago

The community has flagged this. [View](#)



[wredlich](#) 22 hours ago

Bid \$42,069

[↑ 10](#)



[smdcapital](#) 3 22 hours ago

Bid \$41,369

[↑ 3](#)

[Load more comments](#)

Why Cars & Bids?

3,220
Auctions completed

\$54 million+
Value of cars sold

85.6%+
Sell-through rate

140k+
Registered members

Success Stories



Rob S. 1994 TVR Chimaera 400HC - \$18,500

"Thanks to the Cars & Bids team for the platform to connect buyers and sellers, with a strong sense of community."

EXHIBIT B
LinkedIn Resume of Omar Qazi



Omar Qazi



...

Omar Qazi

Chief Innovation Officer @ BQE / CEO of Smick Enterprises

Los Angeles, California, United States · 135 connections

[Join to Connect](#)[BQE Software](#)[Santa Clara University](#)[Company Website](#) ↗

About

Experienced software entrepreneur with a nearly lifelong history of working in the computer software industry. Skilled in Full Stack Development, Server Architecture, iOS & Android Applications, Go, Web Standards (HTML, CSS, Javascript) and Ruby on Rails.

Activity



Omar Qazi



New from me: version 3 of Tesla's Solar Roof is being installed on homes in California, and after combing through permits and Instagram and YouTube...

Liked by Omar Qazi

Experience



Chief Innovation Officer

BQE Software

Jun 2015 - Present · 6 years 4 months

Torrance, California



Tech Founder

Predpol, Inc.

Oct 2011 - Present · 10 years

Sillicon Valley and Los Angeles, California

Started this company with a bunch of really smart guys from a few different fields. Two of the other founders are academics who had researched and tested a statistical model for predicting where crimes are most likely to occur in the future. I've been handling the tech stuff as we build a product that let's any police department around the world predict and stop crime before it happens. Things are going pretty well. Someone you know is being protected by PredPol today.

News report about...

Show more ▾



Lead Mobile Developer

BQE Software

Jun 2007 - Sep 2011 · 4 years 4 months

Lead development of BQE Software's iPhone and Android applications.



Omar Qazi

**Santa Clara University**

Bachelor's degree · Economics & Computer Science

2011 - 2015

**Chadwick School**

-

**Santa Clara University**

-

Languages**English**

-

French

-

View Omar's full profile

See who you know in common

Get introduced

Contact Omar directly

[Join to view full profile](#)

People also viewed**Aumil Manzoor**

VP Research and Development at BQE Software



Omar Qazi



Attended University of Kashmir, Srinagar
India



Patrick Allin
Chairman Of The Board at BQE Software
Lake Forest, IL



Aumil Manzoor
Vice President R&D at BQE Software Inc
Torrance, CA



Reyaz Beigh
Founder/CTO at logicParadise Softwares
Handwara



Jake Alvarez Del Castillo
Dynamic Application Support Manager | Results-Driven Customer Success Partner | Effective Cross-Functional Team Leader
Torrance, CA



Gulzar Bhat
Software Engineer at BQE Software
India



Aqib Hanief Bhat
UI/UX Developer at BQE Software's Inc.
Srinagar



Umar Farooq
Product Manager at BQE Software
Srinagar



Tawseef Nazir
Software Engineer at BQE Software
Srinagar

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Others named **Omar Qazi**



Omar Qazi
Project Director at Capital Development Authority
Pakistan



Omar Qazi



Raleigh-Durham-Chapel Hill Area

**Omar Qazi**

Software Engineer | MERN Stack | TypeScript

Pakistan

**Omar Qazi**

Web Development / Software Engineering Leader

New York City Metropolitan Area

30 others named Omar Qazi are on LinkedIn

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**Advanced iOS Development: Keychain Access****Flutter: Part 09 Dart, Cupertino, and Widgets****iOS Core Bluetooth for Developers**[See all courses](#)

Omar's public profile badge

Include this LinkedIn profile on other websites

**Omar Qazi**

Chief Innovation Officer @ BQE / CEO of Smick Enterprises



Chief Innovation Officer at BQE Software



Santa Clara University

[View profile](#)



Omar Qazi

**LinkedIn** © 2021[Accessibility](#)[Privacy Policy](#)[Copyright Policy](#)[Guest Controls](#)[Language ▾](#)[About](#)[User Agreement](#)[Cookie Policy](#)[Brand Policy](#)[Community Guidelines](#)

EXHIBIT C

ProPublica Paycheck Protection Program Federal Loan Database Entries for BQE Software, Inc.

Tracking PPP

Search Every Company Approved for Federal Loans

Search for PPP loan applications by organization, lender, zip code and business type.

 [Home](#) ›

BQE SOFTWARE INC

[? Why is my loan information here?](#)**Loan Amount****\$1,187,610****Where applicants said the money will go**

Payroll	\$1,187,607
Utilities	\$1
Mortgage Interest	\$0
Health Care	\$0
Rent	\$0
Refinance EIDL	\$0
Debt Interest	\$0

Location**Torrance, CA**

Urban

Industry**Software Publishers****Date Approved****Feb. 5, 2021 (Second Round)****Lender****Bank of America, National Association****Jobs Reported****63****Business Type****Corporation****Business Age**

Tracking PPP

Search Every Company Approved for Federal Loans

Search for PPP loan applications by organization, lender, zip code and business type.

 [Home](#) ›

BQE SOFTWARE INC

 [Why is my loan information here?](#)

Loan Amount

\$1,136,142

Amount Forgiven

\$1,146,476

Includes any accrued interest

Where applicants said the money will go

Payroll	\$1,136,142
Utilities	\$0
Mortgage Interest	\$0
Health Care	\$0
Rent	\$0
Refinance EIDL	\$0
Debt Interest	\$0

Location

Torrance, CA

Urban

Industry

All Other Professional, Scientific, and Technical Services

Date Approved

April 15, 2020 (First Round)

Lender

Bank of America, National Association

Jobs Reported

79

Business Type

Corporation

EXHIBIT D

August 11, 2021 @WholeMarsBlog Twitter Posts Concerning Tesla Model X Purchase

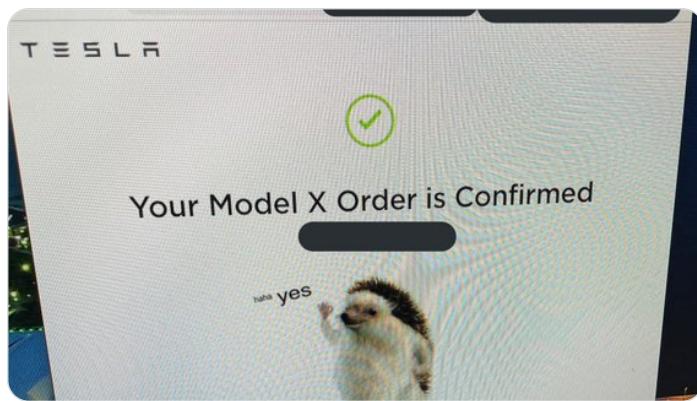


Thread

#



Whole Mars Catalog @WholeMarsBlog · 11h
Just ordered the best Tesla for Dad



Elon Musk

70

29

890



Whole Mars Catalog @WholeMarsBlog

Replying to @WholeMarsBlog

Just to clarify i'm not paying for this car nor is it for me

I mean i'll definitely try and steal it when i'm home but it's my Dad getting a car for himself. was just there when it was time to order

12:23 AM · Aug 11, 2021 · Twitter for iPhone

1 Retweet 118 Likes



Ananya Priyadarshi @Ananya_JaiHind · 8h

Replying to @WholeMarsBlog

Haha anyone would love to have a ride in that beast! Kudos to your dad on his super amazing new car 🎉🎉🎉



MR WHO? @mr_nobody69420 · 8h

Replying to @WholeMarsBlog

Honestly is all we need 🙌



The Tesla Hunter @TeslaHunterX · 2h

Replying to @WholeMarsBlog

Yeah wouldn't want the green grinch who plays lawyer to accuse you of using donation money. That dudes an asshole



Ryan "technopeasant" Scanlan (DVTO) @Xenius101 · 2h

Super offensive to assholes, they at least have a purpose.



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@WholeMarsBlog

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Testing Tesla FSD Beta

What's happening

COVID-19 · LIVE

Experts say masks are safe and effective in preventing spread of COVID-19



Trending in United States

The Delta Variant

People discuss the spread of COVID-19's Delta variant across the country

Trending with [My Fall](#)

Politics · Trending

Emergency Alert System

5,036 Tweets

COVID-19 · LIVE

COVID-19: News and updates for California



The Economist 5 hours ago

The world is now living through climate change

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@WholeMarsBlog

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Testing Tesla FSD Beta**What's happening**

COVID-19 · LIVE

**Experts say masks are safe and effective in preventing spread of COVID-19**

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The Delta Variant

People discuss the spread of COVID-19's Delta variant across the country

Trending with [My Fall](#)

...

Politics · Trending

Emergency Alert System

5,036 Tweets

...

COVID-19 · LIVE

**COVID-19: News and updates for California** **The Economist** · 5 hours ago
The world is now living through climate change[Show more](#)[Terms of Service](#) [Privacy Policy](#) [Cookie Policy](#)
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EXHIBIT E

August 25-31, 2021 @WholeMarsBlog Twitter Posts Concerning Tesla Model 3 Sale



← Tweet

#



 Whole Mars Catalog
@WholeMarsBlog

2018 Tesla Model 3 Long Range signed by Elon Musk with FSD up for auction.

This is a very special car that is part of Tesla history. Was one of the first 200 privately owned cars to run Tesla's FSD beta. Hope it finds a good home 😢 Selling to sue AG.



2018 Tesla Model 3 Long Range - 1 Owner, Unmodified, California-Kept, Autopi...
This 2018 Tesla Model 3 Long Range is for sale on Cars & Bids! Auction ends September 1 2021.

 carsandbids.com

4:36 PM · Aug 25, 2021 · Twitter for iPhone

59 Retweets 8 Quote Tweets 497 Likes



Joey's Cleaning Lady @joeys_lady · Aug 25

Replying to @WholeMarsBlog

damn they attorney general done screwed up



adam @adamhoov · Aug 25

Replying to @WholeMarsBlog

Man I'm so sorry you're dealing with all this shit



Byron Ladias @Byronn4561 · Aug 25

what is he dealing with



Show replies



Arek @ArkadiuszKula · Aug 25

Replying to @WholeMarsBlog

Oh noo, this is sad 😢❤️

And yes hope it will find a good home and wish you a success in fighting AG



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Testing Tesla FSD Beta

What's happening

Weather · **LIVE**



Hurricane Ida makes landfall in Louisiana as an 'extremely dangerous' Category 4 storm

Trending with [#Hurricane_Ida](#), [Louisiana](#)

 Variety  · 41 minutes ago

Ed Asner dies at 91



Trending with [Jonah](#)

Television · **LIVE**



BBNaija: All the action from the house 

 Connecticut Post · 1 hour ago

The U.S. veteran helping Afghans through Kabul from his home office



Trending in United States

Mr. West

3,596 Tweets

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**Leif Johansson** @Nossnahojfiel · Aug 26

What does AG stand for?

[2](#)[1](#)

...



Search Twitter

#

**H T** @techhmt · Aug 25

Replying to @WholeMarsBlog

I bet that visor will be worth more than the whole rest of the car in a few years!

[1](#)[8](#)**Random NPC - Toxic Free (less sus than yesterday)** @Ra... · Aug 25

Replying to @WholeMarsBlog

This better go to a good home.

[1](#)[1](#)**Brian** @lqdchkn · Aug 25

Replying to @WholeMarsBlog

[1](#)**Ali** @Ali_Tesla585 · Aug 25

Replying to @WholeMarsBlog

This is a collector's car. Sad that it has to go, and sadder what it's being sold for.

[1](#)[31](#)**Whole Mars Catalog** @WholeMarsBlog · Aug 25

it's an auction, won't sell if it's not worth it

[2](#)[1](#)[Show replies](#)



← Tweet

#



Whole Mars Catalog
@WholeMarsBlog

It's going to be so satisfying to sue Aaron, his company, his charity, and it's board. 😊

Thank you all for making it possible

10:19 AM · Aug 31, 2021 · Twitter for iPhone

40 Retweets 1 Quote Tweet 720 Likes



Who can reply?

People @WholeMarsBlog follows or mentioned can reply



VM @vm_one1 · Aug 31

Replying to @WholeMarsBlog

We with you bro. 👍👍



Alex (AMA Mazing) 😊🇦🇺💎🇺🇸 @AMA_Mazing_ · Aug 31

Replying to @WholeMarsBlog

Reminder to the people in the comments to donate if you have the money. And thank you so much @WholeMarsBlog for using your time, money and effort into fighting a very worthy fight.

	Aaron Jacob Greenspan
	Smick Enterprises Inc., Elon Musk, Tesla, Inc. and Omar Qazi
r:	3:2020cv03426
	May 20, 2020
	US District Court for the Northern District of California
lge:	Jacqueline Scott Corley
it:	Securities/Commodities

Legal Defense Against Aaron Greenspan, organized by Omar Qazi
After threatening and harassing me ever since he doxxed me on my 25th birthday, Tesla ... Omar Qazi needs your support for Legal Defens...
🔗 gofundme.com



matt miller @MattMillerCubed · Aug 31

Ty for reposting this



Show replies



Magnus Malm @malm_magnus · Aug 31

Replying to @WholeMarsBlog



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Whole Mars Catalog

@WholeMarsBlog

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Testing Tesla FSD Beta

What's happening

Weather · LIVE

Ida pummels parts of the northeast with heavy rain, historic flooding as a new named storm forms



 Los Angeles Times · Yesterday

Incarcerated firefighters are part of the battle against the Caldor fire



 Texas Tribune · September 1, 2021
Abortion as early as six weeks pregnant is now banned in Texas, giving the state one of the strictest laws in the country



Sports · Trending

Michael Irvin

...

Television · LIVE

BBNaija: All the action from the house 🇳🇬



Trending with **Boma**

Show more

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Replying to @WholeMarsBlog
💪🔥

Replying to @WholeMarsBlog

Replying to @WholeMarsBlog

Replying to @WholeMarsBlog

YAY! I hope that your doing so gives him the clarity to rethink the direction his life is moving in and choose a path with more happiness and more success.

but it likely won't.

1 11

Replying to @WholeMarsBlog

No his brain is wired for revenge.

6

Replying to @WholeMarsBlog

Bring him downnnnnnn!!!

1

Replying to @WholeMarsBlog

I hope you lay an epic smackdown in a court of law.

3

Replying to @WholeMarsBlog

Wish you all the best brother!!! 🎉

3

Replying to @WholeMarsBlog

Hit him where it hurts 😊



7

Replying to @WholeMarsBlog

Heart icon

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Relevant people



Whole Mars Catalog

@WholeMarsBlog

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Testing Tesla FSD Beta

What's happening

Weather · LIVE



Ida pummels parts of the northeast with heavy rain, historic flooding as a new named storm forms

Los Angeles Times · Yesterday
Incarcerated firefighters are part of the battle against the Caldor fire



Texas Tribune · September 1, 2021
Abortion as early as six weeks pregnant is now banned in Texas, giving the state one of the strictest laws in the country



Sports · Trending

Michael Irvin

Television · LIVE

BBNaija: All the action from the house



Trending with **Boma**

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Testing Tesla FSD Beta**What's happening**

Weather · LIVE

**Ida pummels parts of the
northeast with heavy rain,
historic flooding as a new named
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Los Angeles Times · Yesterday

**Incarcerated firefighters are part
of the battle against the Caldor
fire**

Texas Tribune · September 1, 2021

**Abortion as early as six weeks
pregnant is now banned in Texas,
giving the state one of the
strictest laws in the country**

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Michael Irvin

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Texas Tribune · September 1, 2021

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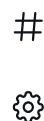
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@WholeMarsBlog

By the way, the car sale isn't actually needed to counter sue Aaron.

We had an anonymous donor tell us that they're willing to contribute a large sum on the condition that it be used only to finance litigation against Aaron Greenspan & his board.

Finally, TSLAQ is on trial.

10:33 AM · Aug 31, 2021 · Twitter for iPhone

43 Retweets 4 Quote Tweets 772 Likes



Who can reply?

People @WholeMarsBlog follows or mentioned can reply



Whole Mars Catalog @WholeMarsBlog · Aug 31



Replying to @WholeMarsBlog

Aaron will be forced to turn over all kinds of documents revealing what was really going on behind the scenes of TSLAQ all these years.

He'll be forced to reveal the secrets he's been stalking and harassing Omar for years to hide.



Doggiewumpus @Doggie_wumpus · Aug 31



Replying to @WholeMarsBlog

Yes!!



yatin kheti @YatinKheti · Aug 31



Replying to @WholeMarsBlog

Yes! Love this!



Wendy Halder 🚗⚡️🌐😊🏡🚀🌲 @wendishen99 · Aug 31



Replying to @WholeMarsBlog



I hope that anonymous donor sees these posts and knows how much their contribution is appreciated by the community!

#TeslaFam 🖤



AI Joe 🤖, FSD Button 🙏 #dos_semanas #twoweeks @j... · Aug 31



True



MadManx @madmanx89 · Aug 31



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Thanks @MarkZuckerberg



5

**Black Cats** @thoromyr · Aug 31

Replying to @WholeMarsBlog

I'm waiting for the motion to block the filing of any suits against Aaron Greenspan claiming anti-SLAPP



9

**Kaley** @KaleyGoode · Aug 31

Replying to @WholeMarsBlog

This is fabulous news 🎉



5

**Jeff** @feedyourhed · Aug 31

Replying to @WholeMarsBlog

His name rhymes with tusk



9

**Lipsytee** @Lipsytee · Aug 31

That's what Aaron is gonna say, guaranteed.



6

**TESLA SOUTHERN** @doge_southern · Aug 31

Replying to @WholeMarsBlog

THIS IS WONDERFUL NEWS THANK YOU ANONYMOUS DONOR!!!!



18

**That T3sla Guy** @thatt3slaguy · Aug 31

Replying to @WholeMarsBlog

I know his blood is boiling with anger reading this tweet



71

**TeslaJokes** 🚗💡⚡️&💡💡/s @tesla_jokes · Aug 31

Fortunately, the law doesn't protect someone's feelings. Not financial, nor legal advice. I know a good wannabe lawyer though.



4

**TESLA SOUTHERN** @doge_southern · Aug 31

Replying to @WholeMarsBlog

Does this mean you don't have to sell your car?? I hope not



12

**Rachel L. Cannata** 🌈⚡️🌐 @rachellee221 · Aug 31

Replying to @WholeMarsBlog

Awesome!



1

**Whitney Savannah Robinson** ❤️ @WhitSavannah · Aug 31

Replying to @WholeMarsBlog

Anonymous donor? What is an anonymous donor? What is being donated?



1

**ostyn hyss** @OstynHyss · Aug 31

Someone is donating money to help sue Aaron but they don't want to disclose who they are.



3



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ostyn hyss @OstynHyss · Aug 31
Replying to @WholeMarsBlog
WOW this is a big deal

Whole Mars Catalog @WholeMarsBlog · Aug 31
yep :)

Forstall @forstall_ · Aug 31
Replying to @WholeMarsBlog
This is more exciting than battery day.

(Ar)²appleY @Ar_Squared89 · Aug 31
Replying to @WholeMarsBlog
That is awesome bro! Amazing part on that donor!



Bill Holder @bh13850 · Aug 31
Replying to @WholeMarsBlog
Go get 'em!

Dr Eam Co Ding 💎💡 @xDreamCoding · Aug 31
Replying to @WholeMarsBlog
Excellent! 😎

Fermi's Pair of Socks @SophistUnpaid · Aug 31
Replying to @WholeMarsBlog
Ha. Awesome.

Ruff Past @ruffpast · Aug 31
Replying to @WholeMarsBlog

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Whole Mars Catalog on Twitter. By the way, the CEO is actually needed to do this in Action. We had a anonymous donor tell us that they're wil...

That's awesome man, I hope everything works out in your favor!!



4

**Doggiewumpus** @Doggie_wumpus · Aug 31

...

Replying to @WholeMarsBlog

Thanks to the anonymous donor



11

**Thinker** @goldentouch73 · Aug 31

...

Replying to @WholeMarsBlog

This is really great.



4



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EXHIBIT F

March 31, 2019 *The Drive* Article, “Unencrypted Video and Personal Data Stored on Teslas Raise Significant Privacy Concerns: Report” by Rob Stumpf

Unencrypted Video and Personal Data Stored on Teslas Raise Significant Privacy Concerns: Report

Imagine crashing your car and someone blackmailing you with the footage later on.

BY ROB STUMPF MARCH 31, 2019

NEWS

@KTVUCAMERAMAN ON TWITTER



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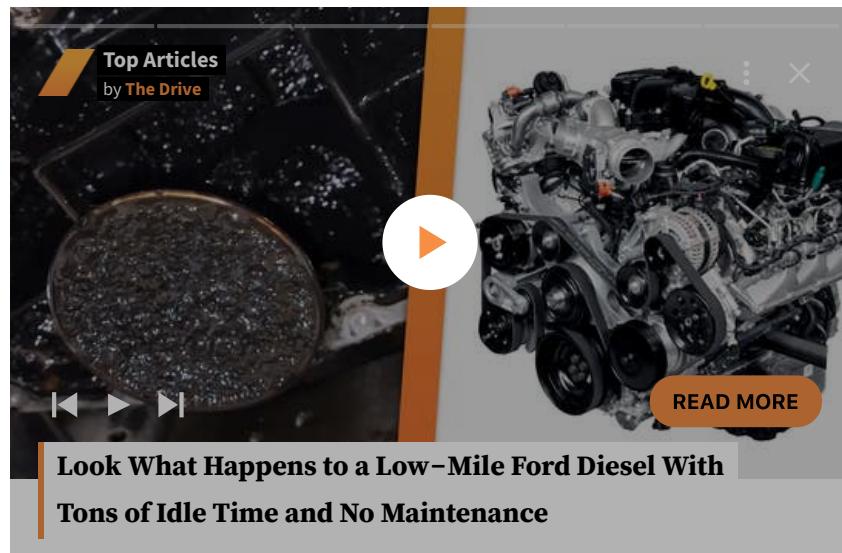
RobDrivesCars
 allthingslow

As cars continue to become more advanced and stuffed full of technology, they've begun to catch the attention of security researchers. One analyst in particular recently purchased a salvaged [Tesla Model 3](#) in order to conduct a [series of tests](#), ultimately determining that the vehicle stores massive amounts of unencrypted personal data, accessible to any individual who has physical access to the car.

A researcher and self-proclaimed white hat hacker who goes by GreenTheOnly often takes advantage of Tesla's [advantageous bug bounty program](#). The mutually beneficial strategy helps Tesla to patch serious security bugs while rewarding the researchers who find them with thousands of dollars in reward. Recently, the researcher spoke with [CNBC](#) under the condition of anonymity, showing just how much personal data he was able to extract from salvage vehicles.

The researcher and his colleague (who has bought and repaired hundreds of wrecked Tesla vehicles) recently purchased a [salvage Model 3 found in a junkyard](#). The vehicle would be studied by GreenTheOnly, who was able to find an alarming amount of personal data left in the car after it had been hauled away for scrap.

Using information found in the car, the vehicle was able to be pinpointed back to its owner, a construction company based in the greater Boston area. The researchers were able to gather data stored by at least 17 different devices that had been connected to the car during its lifespan, none of which were encrypted. Data included 11 phonebooks' worth of contact information, calendar entries for the devices which paired, and even a series of email addresses. The researchers were also able to discover the last 73 locations which the driver(s) had navigated to.



But perhaps the most damning evidence found in the car was video of two separate crashes that occurred in the wrecked Model 3.



CAPTURE VIA CNBC

The first video showed the crash that finally brought the car to the salvage yard. The vehicle sped out of control and crashed into trees on the wrong side of the road. GPS and timestamp data was also included, showing the precise time and location of the crash.

But it gets deeper. Phone data from the time of the crash contained enough personally identifiable information to pinpoint who may have been in the car. A phone paired to the vehicle at the time happened to belong to a relative of the founder of the construction company who owned the Model 3, and incoming call logs showed that a family member had placed a call to the phone only moments before it had crashed.



VIA REDDIT

| Location data shows the moment of the crash.

A second video uncovered an earlier accident where the Model 3 sideswiped a guard rail. More video footage shows a general disregard for safety or the possibility that the person behind the wheel was driving while impaired.



VIA REDDIT

Limited data can be collected by any individual willing to purchase a set of EDR cables from [Crash Data Group](#) for \$995. Raw data output can be collected with [Tesla's EDR tool](#) and then [re-uploaded to Tesla's website](#) in order to generate a basic EDR report (a sample of Tesla's report from a Model S [can be found here](#)). Video and other personal data can't be collected through this method and requires a more invasive approach.

One feature which Tesla owners enjoy is the car's recently updated Sentry Mode, a security-like application which enables event-based recording while a vehicle is parked. Specifically, the feature is meant to help capture vandals and prevent thefts. But, the cameras aren't just recording when using Sentry Mode. In fact, there's no way for owners to know just when their cameras—including the cabin-facing interior camera—is capturing video.

Tesla Model 3 video caught in sentry mode



Opting out of data collection isn't exactly as simple as one might think. Though possible, GreenTheOnly goes on to explain that one caveat of giving up data



collection is also losing [over-the-air software updates](#) and other functionality which make Tesla's vehicles highly desirable to technology aficionados.



CHANNELS

Collected information also serves to benefit the automaker directly, protecting it against false claims of Autopilot crashes. Tesla has [provided information regarding fatal crashes to the public](#), which allowed it to both dispel rumors and calm public opinion. Tesla has seen a [decrease in use of its Advanced Driver Assistance System, Autopilot](#), following a recent high-profile crash. Though the data collection is important for the automaker to prevent the spread of incorrect information, it certainly raises the question of just what [reasonable expectation of privacy](#) drivers should have when owning a Tesla vehicle and opting in to data collection.

Tesla Motors Club @TeslaMotorsClub · Apr 2, 2018

NTSB "Unhappy" With Tesla's Comment on Fatal Model X Crash teslamotorsclub.com/blog/2018/04/0... #Tesla #ModelX

Elon Musk @elonmusk

Lot of respect for NTSB, but NHTSA regulates cars, not NTSB, which is an advisory body. Tesla releases critical crash data affecting public safety immediately & always will. To do otherwise would be unsafe.

11:37 AM · Apr 2, 2018

5.3K 88 Copy link to Tweet

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Tesla says that customers are ultimately responsible for the data stored on their cars. Should their vehicle be sold or otherwise disposed of, it's the automaker's belief that the owner should first factory reset their car.

"Tesla already offers options that customers can use to protect personal data stored on their car, including a factory reset option for deleting personal data and restoring customized settings to factory defaults, and a Valet Mode for hiding personal data (among other functions) when giving their keys to a valet," explained a Tesla spokesperson to *CNBC*. "That said, we are always committed to finding and improving upon the right balance between technical vehicle needs and the privacy of our customers."



Such is true with vehicles that the automaker sells through a popular dealer-only auctioneering service, [Manheim](#). Another tipster from the auction company told *CNBC* that Tesla does not wipe customer data from cars which traverse its sales block, nor do the auction's employees. Manheim declined to comment on the validity of the claim.



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The security of the data at Tesla has also been previously questioned. A publicly exposed kubernetes cluster operated by Tesla was compromised in 2018 and used to mine cryptocurrency; it was then found to be the same cluster used to house Autopilot data. In 2017, Tesla exposed a [private key](#) used by its maps server for more than a year and reportedly did not respond to reports of the vulnerability [for more than two months](#) before it was brought to public attention. There have also been reports of database dumps from Tesla, several of which include wireless networks and their [corresponding passwords](#), all of which were stored in plain text.

Two former Tesla service employees also told *CNBC* that Tesla has a few built-in security features to flag customers who may have attempted to reverse-engineer their cars. Those who are flagged reportedly will not be prioritized to receive cutting-edge updates.

Still, knowing that any individual with the right skills can reveal the final moments of a car's life could be daunting. Things people prefer to keep private—where they go, who has been in the car, or how they drive—can be exposed to the public in the blink of an eye. Celebrities and high-profile individuals in particular could shift their views of the automaker's cars should they know that their personal data could be exposed. Even individuals who oft have nothing to hide tend to change their stance once the shoe is on the other foot.

TESLA DELAYING DELIVERIES OF STANDARD RANGE MODEL 3

By Edward Niedermeyer
Posted in [TECH](#)

THIS IS WHAT THE COCKPIT OF THE UPCOMING TESLA SEMI TRUCK LOOKS LIKE

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TESLA KILLS ANNUAL MAINTENANCE PROGRAM AFTER REALIZING ITS CARS ARE JUST TOO RELIABLE

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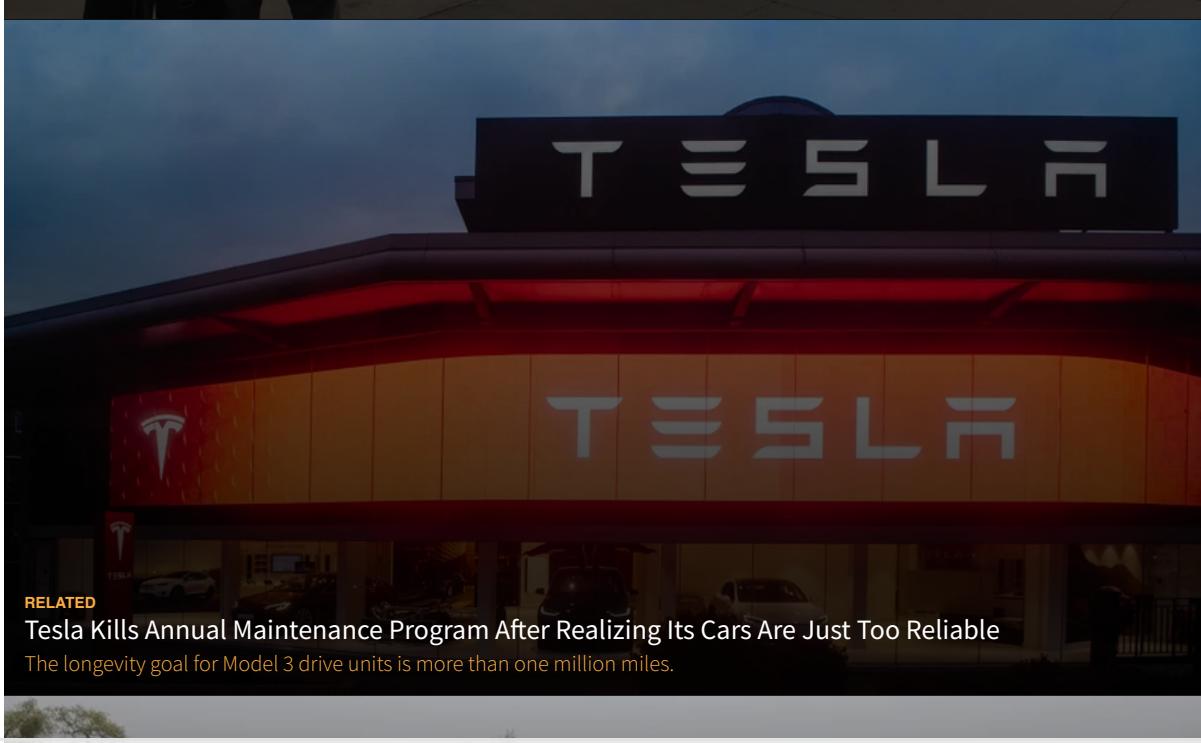
The saga of the \$35,000 Tesla Model 3 rolls on, as customers report Tesla is delaying deliveries and attempting to upsell them.



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Compare it to the Model 3 and you won't be surprised. Compare it to a traditional semi truck and you'll be floored.



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THE DRIVE



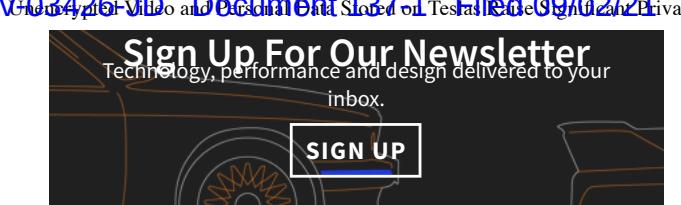
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**RELATED****Tesla Model 3 Right-Hand-Drive Prototype Spotted, Signals Possible Global Expansion**

This prototype sighting seemingly confirms Tesla will be chasing sales in previously untapped markets like Britain, Australia, and Japan.

**RELATED****Watch a Father Use Tesla's Summon Feature to Pull His Child's Baby Tooth**

Think of it as a very expensive and high-tech alternative to the ol' doorknob trick.



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